

**EXHIBIT C**  
**Juniper Project FEIS (2024)**



U.S. Department of the Interior  
Bureau of Land Management

# Bald Mountain Mine Plan of Operations Amendment Juniper Project Final Environmental Impact Statement

DOI-BLM-NV-L060-2021-0013-EIS



U.S. Department of the Interior  
Bureau of Land Management  
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# **Appendix J**

## **Responses to Comments on the Draft EIS**

**Appendix J. Responses to Comments on the Draft EIS**

<b>Name and Affiliation</b>	<b>Comment ID</b>	<b>Category</b>	<b>Comment Text</b>	<b>Comment Response</b>
Tammi M. Adams and Laura Leigh Wild Horse Education	S-050, C-010	Cumulative impacts	The BLM violates NEPA by failure to consider cumulative impacts to ambient air, drinking water resources, soils, groundwater availability, and any past, present, and future impacts from potential contamination to Nevada's surface and groundwater supplies. Please provide this data and analysis information prior to in any forthcoming Final EIS, Decision, and FONSI. The BLM BFO violates NEPA and Agency policies by failure to consider past, present, and future cumulative impacts from mining contaminants (i.e., arsenic) to human health and the environment. Please provide, at a minimum, past and present analyses of arsenic in soils, surface water, groundwater, rangeland forage, and game animals (mule deer) from within and surrounding the existing and proposed action areas within any forthcoming Final EIS, Decision, and FONSI.	The EIS provides analysis of cumulative impacts on each of the resources mentioned in the comment at a level commensurate with the anticipated scale and intensity of the impacts, as directed by NEPA. Please see resource-specific discussions of cumulative impacts in Section 3.15.2.4 ( <i>Air Quality and Greenhouse Gas Emissions</i> ), Section 3.3.2.4 ( <i>Water Quality and Quantity</i> ), Section 3.4.2.4 ( <i>Soils</i> ), Section 3.10.2.4 ( <i>Livestock Grazing</i> ), and Section 3.7.2.4 ( <i>Wildlife and Fisheries Resources</i> ). See response to Comment S-050, C-006 and Section 3.3.2.1.3 of the EIS for additional discussion of arsenic in water and air. In brief, concentrations of arsenic predicted to exceed the regulatory threshold would migrate up to approximately 1,000 feet east of the Top Pit underground mine workings and would not extend outside the footprint of the Top Pit and, therefore, are not anticipated to affect downgradient water quality. Additionally, the potential emissions of arsenic are below the major HAP emission threshold of 10 tons per year per HAP. No change was made to the final EIS.
Tammi M. Adams and Laura Leigh Wild Horse Education	S-050, C-012	Cumulative impacts	The responsibility of an EIS is to provide data and analyses of the amount of forage lost to the Triple B wild horses (specifically permanently lost forage capacity of the HMA, which also impacts livestock AUM allocations) and baseflows in the seeps and springs (i.e., water quantity and quality data). BLM BFO's anticipation of such limited cumulative impacts to the Triple B wild horses and burros, golden eagles, and Greater Sage Grouse is arbitrary, unreasonable, and out-of-date. BLM BFO violates NEPA by failure to consider and actually provide meaningful and available ENVIRONMENTAL DATA TO DISCERN ACTUAL CUMULATIVE ENVIRONMENTAL IMPACTS to forage and water resources for the Triple B wild horses and burros, golden eagles,	Section 3.11.2 of the EIS estimates that the Proposed Action would contribute an additional 3,969 acres of surface disturbance, of which 2,906 acres would be long term and 1,063 acres would be permanent, compared to the No-Action Alternative. This would reduce the availability of forage for wild horses within the Triple B HMA. However, the estimated cumulative surface disturbance in the Triple B HMA contributed by past, present, and RFFAs is 104,141 acres (updated from 104,167 acres in the draft EIS) or 8% of the total area of the CESA, and cumulative effects on wild horses are anticipated to be minor, long term, and localized. The focus of the BLM's management of wild horses is to reduce overpopulation on the range to protect the health of the animals and the land on which they depend. See response to Comment S-050, C-019 addressing the effects of drawdown on seeps and springs. The EIS also provides analysis of cumulative



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			and Greater Sage Grouse (all required historical and present day mine permit monitoring parameters, GW contaminant migration modeling, perimeter soils contamination, etc.).	impacts on each of the resources mentioned in the comment at a level commensurate with the anticipated scale and intensity of the impacts, as directed by NEPA. Please see discussions of cumulative impacts on other resources mentioned in the comment in Section 3.3.2.4 ( <i>Water Quality and Quantity</i> ), Section 3.8.2.4 ( <i>Special Status Species</i> ), Section 3.9.2.1.1 ( <i>Golden Eagles</i> ), and Section 3.10.2.4 ( <i>Livestock Grazing</i> ). No change was made to the final EIS.
Tammi M. Adams and Laura Leigh Wild Horse Education	S-050, C-004	Analysis scope, methods, and assumptions	This EIS is arbitrarily absent of any data nor analyses of existing and potential commination impacting humans and the environment despite being in operation in Nevada for 36-years, and in spite of federal laws protecting the air we breathe (CAA), the water we drink (CWA, SDWA), and the soils where we grow food, which wildlife, livestock, and wild horses and burros graze upon.	The EIS provides salient information about the existing conditions and affected environment and potential environmental consequences of implementing the alternatives. Please see resource-specific discussions in Section 3.15 ( <i>Air Quality and Greenhouse Gas Emissions</i> ), Section 3.3 ( <i>Water Quality and Quantity</i> ), Section 3.4 ( <i>Soils</i> ), Section 3.7 ( <i>Wildlife and Fisheries Resources</i> ), Section 3.10 ( <i>Livestock Grazing</i> ), and Section 3.11 ( <i>Wild Horses</i> ). No change was made to the final EIS.
Shane Bybee White Pine County Board of Commissioners	S-047, C-008	Monitoring and mitigation	The County appreciates and supports wildlife mitigation efforts described in Sections 3.7 and 3.8.	Acknowledged. Thank you for your comment.
Tammi M. Adams and Laura Leigh Wild Horse Education	S-050, C-003	Monitoring and mitigation	This Draft EIS has not provided a Proposed Plan committed to the protection of humans and the environment, nor the limited surface and groundwater resources, ambient air quality, etc.	The purpose of an EIS is to demonstrate that “Federal agencies have considered relevant environmental information, and the public has been informed regarding the decision-making process” (40 CFR 1502.1). The EIS must also discuss means to mitigate adverse environmental impacts (40 CFR 1502.16(9)). Importantly, “[while] NEPA requires consideration of mitigation, it does not mandate the form or adoption of any mitigation” (40 CFR 1508.1(s)). A “Proposed Plan,” as stated in the comment, is not a requirement for preparing an EIS under NEPA. In fulfillment of the requirements of NEPA, the EIS evaluates the effectiveness of both ACEPMs (Appendix C) and agency-identified mitigation measures in avoiding, minimizing, or mitigating the impacts of the action alternatives. The EIS also identifies other Federal